

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
ZACHRY HOLDINGS, INC., <i>et al.</i> <sup>1</sup>	)	Case No. 24-90377 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	<b>Re: Docket No. 2769</b>

**AMENDED CERTIFICATE OF COUNSEL REGARDING  
SUSMAN GODFREY L.L.P.'S FINAL FEE APPLICATION FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM MAY 21, 2024 THROUGH FEBRUARY 27, 2025**

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, counsel to the above-captioned debtors and debtors in possession (collectively, “**Debtors**”) certifies as follows:

1. On April 18, 2025, Debtors filed *Susman Godfrey L.L.P.’s Final Fee Application for Allowance of Compensation and Reimbursement of Expenses for the Period from May 21, 2024 Through February 27, 2025* [Docket No. 2769] (the “**Fee Application**”). The Fee Application attached a proposed order [Docket No. 2769-1] (the “**Proposed Order**”).
2. The deadline for parties to file objections and responses to the Fee Application was May 9, 2025 at 12:00 p.m. (prevailing Central Time) (the “**Objection Deadline**”). No objections or responses to the Fee Application were filed on the docket on or before the Objection Deadline. Counsel has not received comments from any party.
3. Debtors respectfully request that the Court enter the Proposed Order that is attached to this Certificate of No Objection.

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<sup>1</sup> The last four digits of Zachry Holdings, Inc.’s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors’ proposed claims and noticing agent at [www.veritaglobal.net/ZHI](http://www.veritaglobal.net/ZHI). The location of the Debtors’ service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

Date: May 12, 2025

Respectfully submitted,

By: /s/ Jesse-Justin Cuevas

Geoffrey L. Harrison  
S.D. Admissions No. 16690  
gharrison@susmangodfrey.com  
Richard W. Hess  
S.D. Admissions No. 605712  
rhess@susmangodfrey.com  
Adam Carlis  
S.D. Admissions No. 1618804  
acarlis@susmangodfrey.com  
Hunter Vance  
S.D. Admissions No. 3124867  
hvance@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1000 Louisiana St., Suite 5100  
Houston, Texas 77002  
Tel: (713) 651-9366  
Fax: (713) 654-6666

Jesse-Justin Cuevas  
Admitted *Pro Hac Vice*  
jcuevas@susmangodfrey.com  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, California 90067  
Tel: (310) 789-3100  
Fax: (310) 789-3150

*Special Litigation Counsel for Debtors*

**Certificate Of Service**

I certify that on May 12, 2025, I caused a copy of the above Certificate of Counsel to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Jesse-Justin Cuevas  
Jesse-Justin Cuevas